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October 1, 2024

VIA E-MAIL

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
(202) 805-0288

Re: Match Group, LLC v. Beazley Underwriting, Ltd., No. 1:22-cv-4629-LGS
Letter-Motion for Extension of Time

Dear Judge Schofield:

On behalf of defendant Beazley Underwriting, Ltd. (“Beazley”), I write to respectfully request a further two-week extension of time – until October 16, 2024 – for Beazley to answer plaintiff Match Group, LLC’s (“Match”) First Amended Complaint. This is the second request for an extension of this deadline. The Court previously extended the deadline from September 25, 2024 to October 2, 2024.

As discussed in my September 19, 2024 letter, Beazley has informed Match that the insurance policy at issue in this litigation will likely be exhausted by payment on a separate claim submitted by the policy’s Named Insured and another Insured. (*See* ECF No. 88 at 1.) Since submitting the September 19, 2024 letter, Beazley and Match have met and conferred to discuss this development and its implications for this case.

Beazley respectfully submits that, in the interests of judicial economy, the parties need additional time to continue their discussions. We understand that Match intends to submit a letter requesting an extension of the briefing deadlines of its planned Rule 56(a) motion, to which Beazley consents. Beazley respectfully requests that the Court also extend Beazley’s time to respond to the First Amended Complaint to October 16, 2024.

Beazley acknowledges that this request is untimely pursuant to Section I.B.3 of Your Honor’s Individual Rules and Procedures for Civil Cases. However, Beazley only learned yesterday of



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Match's desire to continue its Rule 56(a) briefing deadlines to allow further time to meet and confer, and the parties thereafter worked cooperatively and promptly to agree on an extension of the case deadlines. Accordingly, Beazley respectfully requests that the Court make an exception under the circumstances to allow the parties to continue their dialogue before this matter proceeds.

We thank the Court for its consideration of this matter.

Respectfully Submitted,

A handwritten signature in blue ink that reads 'Jonathan S. Zelig'.

Jonathan S. Zelig

cc: Counsel of Record (via CM/ECF)